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September 1, 1992

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To: Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Subject: PR Docket 92-136 Comments

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1- I believe that the Commissioners might find an "eyewitness" account by one who was at the scene of the fire at the time the fire started rather illuminative. After my second retirement I decided that one way I would continue to be of service to my fellow men was to run telephone patches for members of the US tuna fishing fleet. At that time (the early 1970's as I recall) the big purse seiners did their fishing off the coast of South America and sometimes were at sea continuously for a month or two or three. The class of vessel used was required to have four licensed officers aboard and these were normally US citizens. Amateur Radio was used by a fair number of crews to remain in touch with families back in the States. The San Diego, California area was the home of most of the families. My station location on the east side of the hills of the Palos Verdes peninsula in the Los Angeles area enjoyed a great view out to sea from South West through South and on around to almost East with a resulting great signal into the fishing grounds. The telephone patches were loud and clear much to the delight of the families and crew members. Then came the QUOTA.

2-Variou international agreements resulted in a quota system that closed the eastern Pacific to tuna fishing just a few months after the first of the year for the remainder of the year. A portion of the fleet decided (mainly the vessels home ported in Puerto Rico) to try fishing the Gold Coast of Africa during the Pacific closed season. The Amateur 21 MHz. band supported the required path for several hours a day. Shortly after the start of the Africa fishing the phone patches sometimes involved patches to vessel owners, canneries, parts suppliers and other worrisome destinations. After one of the patches I was called by an Amateur station in upstate New York. Julie was so upset with me for having the temerity to carry such traffic that his voice was quavering. He gave me a full broadside salvo. When he finally let up on the "monopoly" switch, I replied as calmly as I could. To this day I remember my words. I said, "Julie, I have been worried by the content of some of our traffic and I have been looking through the regulations so as to be able to read the gang the pertinent sections but I have not found them. Would you mind quoting the sections we are violating?" This was such an affront to Julie that he, at his own expense, made a telephone call to the FCC offices in Washington D. C.. I, in self defense also made

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a telephone call to the same offices. The four words which were found in the existing regulations (which related only to the issuance of an Amateur Radio Station License) were NOR FOR THEIR BENEFIT. The four words now quoted are NOR FOR THEIR USE but I feel quite sure that my quote is accurate. Benefit, use .. who cares ? During my telephone conversation I was made aware of equipment which was carried by the vessels which was intended for their "Business" communications. It was Single Sideband equipment just like ours and operated on frequencies spread throughout the short wave region just like our ham bands the main difference being that it cost a lot more. Armed with that information, on my next contact with the fleet, I asked why they were not using that equipment for the "commercial" traffic. The answer was very simple, they said, "Butch, we have not been able to talk to ANYONE on that equipment since we left Puerto Rico". One of the vessels which had not made the trip to Africa was in port at San Pedro so I arranged to go aboard and inspect the installation. Well ... by Amateur Radio standards ... the situation in regard to antennas was hopeless. How anyone with even a rudimentary knowledge of short wave propagation could expect a little vertical whip antenna mounted down among all the rigging, equipped with the most inefficient traps I have ever seen, to cover the path from Africa to California is beyond me (to say nothing of the state of disrepair of the antenna and connected equipment). I was assured that the installation I had seen was the norm for the fleet. I then made a market survey and found that there was NO suitable antenna available. Subsequent experience in the field confirmed that the technical knowledge available to the fleet was not capable of solving their problems in regard to long range voice communication. So, esteemed commissioners, that is where the fire started. I have felt bad about it ever since and welcome an opportunity to explain what happened.

3- I think there are some important lessons to be gained from the experience. One of the most evident is the power of self policing. There are people out there who will take one to task even when it appears that someone MIGHT be violating some rule which even the objector does not know. The second is the powerful overkill which results from such a transgression. I, personally, can see no real harm from a PURE Amateur providing a bit of competition to commercial interests which are either unable or unwilling to offer a better service. Should such a policy REALLY result in serious dilution of the Amateur Service, then the matter could be addressed. In the mean time I believe the policy would allow the United States to better compete on a worldwide basis. One method that comes to mind to pacify those who foresee the destruction of the status quo would be an administrative procedure to remove objectionable activities from the bands by petition from the objectors. This procedure would place the burden of determining the details of the activity on the objectors and might result in the activity, if found worthy, being assigned a channel just outside the Amateur band or bands in question. They would thus join, maybe on a sharing basis,

activities such as the Military Amateur Radio Service and the Civil Air Patrol. Areas in which there are serious voids would be thus highlighted and might serve as a guide for commercial organizations interested in providing service.

Marion A. Mason-----
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